

1
2
3
4
5
6
7
8
9
10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE WESTERN DISTRICT OF WASHINGTON**
12 **IN SEATTLE**

11 WESTRIDGE TOWNHOMES
12 OWNERS ASSOCIATION,

13 Plaintiff,

14 v.

15 GREAT AMERICAN ASSURANCE
16 COMPANY, a foreign insurance
17 company, as successor to
18 AGRICULTURAL INSURANCE
19 COMPANY; GREENWICH
INSURANCE COMPANY, a foreign
insurance company,

Defendants.

No. C16-1011 RSM

STIPULATED MOTION &
PROPOSED ORDER TO EXTEND
DISCOVERY DEADLINE

20 Plaintiff Westridge Townhomes Owners Association and Defendants Great American
21 Assurance Company and Greenwich Insurance Company (collectively the “Parties”) submit
22
23

STIPULATED MOTION & ORDER TO EXTEND
DISCOVERY DEADLINE - 1

CASE NO. 2:16-cv-01011 RSM

HARPER | HAYES PLLC
One Union Square
600 University Street, Suite 2420
Seattle, Washington 98101
Telephone: 206-340-8010
Facsimile: 206-260-2852

1 the following stipulated motion to extend the discovery deadline for the purpose of taking two
2 depositions.

3 The current discovery completion date is December 18, 2017 (*see Dkt. 37*). Plaintiff
4 has requested the depositions of two of Defendants' experts, Jim Perrault and Dennis Smith.
5 These two witnesses are not available for deposition until after the current discovery cut-off.
6 The Parties bring this Stipulated Motion and ask that the Court extend the discovery
7 completion date by four days to complete the depositions of Mr. Perrault and Mr. Smith. The
8 witnesses have indicated that they are available for deposition beginning December 19.

9 Good cause exists to extend the deadline to depose the above-named witnesses and
10 doing so will not prejudice any party. Moreover, a short extension of this deadline will not
11 impact the other dates in the Court's Order.

12 DATED this 5th day of December 2017.

13 HARPER | HAYES PLLC

BETTS, PATTERSON & MINES, P.S.

14
15 By: s/ Todd C. Hayes

16 Todd C. Hayes, WSBA No. 26361
17 s/ Charles K. Davis
18 Charles K. Davis, WSBA No. 38231
19 600 University Street, Suite 2420
20 Seattle, WA 98101
21 **Tel.:** 206.340.8010
22 **Fax:** 206.260.2852
23 **Email:** todd@harperhayes.com
cdavis@harperhayes.com
Attorneys for Plaintiff

By: s/ Joseph D. Hampton

Joseph D. Hampton, WSBA #15297
One Convention Place, Suite 1400
701 Pike Street
Seattle, WA 98101-3927
Tel.: 206.292.9988
Fax: 206.343.7053
Email: jhampton@bpmlaw.com
Attorneys for Defendant Great American
Assurance Company

STIPULATED MOTION & ORDER TO EXTEND
DISCOVERY DEADLINE - 2

CASE NO. 2:16-cv-01011 RSM

HARPER | HAYES PLLC
One Union Square
600 University Street, Suite 2420
Seattle, Washington 98101
Telephone: 206-340-8010
Facsimile: 206-260-2852

1 MOUND, COTTON, WOLLAN &
2 GREENGRASS, LLP

3 By: s/ Kevin F. Buckley

4 Kevin F. Buckley, Admitted *Pro Hac Vice*

5 One New York Plaza, 44th Floor

6 New York, NY 1004

7 **Tel.:** 212.804.4242

8 **Fax:** 212.344.8066

9 **Email:** kbuckley@moundcotton.com

10 Attorneys for Defendant Greenwich

11 Insurance Company

12 BULLIVANT HOUSER BAILEY PC

13 By: s/ Owen R. Mooney

14 Owen R. Mooney, WSBA #45779

15 1700 Seventh Avenue, Suite 1810

16 Seattle, WA 98101-1397

17 **Tel.:** 206.290.8930

18 **Fax:** 206.386.5130

19 **Email:** owen.mooney@bullivant.com

20 Attorneys for Defendants Great

21 American Assurance Company and

22 Greenwich Insurance Company

23 STIPULATED MOTION & ORDER TO EXTEND
DISCOVERY DEADLINE - 3

CASE NO. 2:16-cv-01011 RSM

HARPER | HAYES PLLC
One Union Square
600 University Street, Suite 2420
Seattle, Washington 98101
Telephone: 206-340-8010
Facsimile: 206-260-2852

1
2 **ORDER**

3 Based on the above stipulation, the deadline to complete discovery for the purpose of
4 deposing Defendants' experts, Jim Perrault and Dennis Smith is extended to December 22,
5 2017.

6 DATED this 6th day of December 2017.

7 

8 RICARDO S. MARTINEZ
9 CHIEF UNITED STATES DISTRICT JUDGE

10 Presented by:

11 HARPER | HAYES PLLC

12 By: s/ Todd C. Hayes

13 Todd C. Hayes, WSBA No. 26361

14 s/ Charles K. Davis

15 Charles K. Davis, WSBA No. 38231

16 Attorneys for Plaintiff

17 BETTS, PATTERSON & MINES, P.S.

18 By: s/ Joseph D. Hampton

19 Joseph D. Hampton, WSBA #15297

20 Attorneys for Defendant Great American

21 Assurance Company

22
23 STIPULATED MOTION & ORDER TO EXTEND
DISCOVERY DEADLINE - 4

CASE NO. 2:16-cv-01011 RSM

HARPER | HAYES PLLC
One Union Square
600 University Street, Suite 2420
Seattle, Washington 98101
Telephone: 206-340-8010
Facsimile: 206-260-2852

1 MOUND, COTTON, WOLLAN & GREENGRASS, LLP

2
3 By: s/ Kevin F. Buckley

4 Kevin F. Buckley, Admitted *Pro Hac Vice*
Attorneys for Defendant Greenwich Insurance Company

5 BULLIVANT HOUSER BAILEY

6
7 By: s/ Owen R. Mooney

8 Owen R. Mooney, WSBA #45779
Attorneys for Defendants Great American
Assurance Company and Greenwich Insurance
Company

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23 STIPULATED MOTION & ORDER TO EXTEND
DISCOVERY DEADLINE - 5

CASE NO. 2:16-cv-01011 RSM

HARPER | HAYES PLLC
One Union Square
600 University Street, Suite 2420
Seattle, Washington 98101
Telephone: 206-340-8010
Facsimile: 206-260-2852